

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS PENSION FUND,)	
TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS HEALTH AND)	
WELFARE FUND, TRUSTEES OF THE)	
CHICAGO PAINTERS AND DECORATORS)	
DEFERRED SAVINGS FUND, TRUSTEES OF)	
THE CHICAGO PAINTERS AND)	No. 15 C 4884
DECORATORS APPRENTICESHIP FUND,)	
TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS SCHOLARSHIP FUND,)	Judge Sharon Johnson
AND TRUSTEES OF THE CHICAGO)	Coleman
PAINTERS AND DECORATORS JOINT)	
COOPERATION TRUST FUND,)	
)	
Plaintiffs,)	
)	Magistrate Judge Finnegan
)	
)	
v.)	
)	
COPPER CONSTRUCTION COMPANY,)	
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, GRANT R. PIECHOCINSKI and ARNOLD and KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter Judgment in Sum Certain in favor of Plaintiffs and against Defendant, COPPER CONSTRUCTION COMPANY, an Illinois corporation.

In support thereof, Plaintiffs state as follows:

1. This case was filed on June 3, 2015.
2. Defendant was personally served with Summons and Complaint on June 5, 2015 as shown on the return of service previously filed.

3. The Defendant was defaulted by order of this Court dated August 28, 2015

4. According to the Affidavit of Richard Wolf, attached as Exhibit A, the Defendant owes \$8,728.78 for the audit period from August 1, 2013 through June 30, 2015, consisting of \$6,640.25 in contributions, \$996.03 in liquidated damages, and \$1,092.50 in audit costs. The Defendant owes \$3,320.97 in accumulated unpaid liquidated damages for the period from April, 2014 through July, 2014, which brings the total owed to \$12,049.75.

WHEREFORE, Plaintiffs move this Court to:

A. Enter final judgment in favor of Plaintiffs and against the Defendant Copper Construction Company in the amount of \$12,049.75. (A copy of a proposed order is attached as Exhibit B, and will also be sent via the Court's email system).

**TRUSTEES OF THE CHICAGO
PAINTERS AND DECORATORS, et al.**

By: s/ James R. Anderson
One of Its Attorneys

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